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Attorneys for Defendants

SMF SYSTEMS CORPORATION, TOM

CAFFREY AND RUBY CAFFREY

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JOHN A. MOFFETT,

Plaintiff,

vs.

SMF SYSTEMS CORPORATION, A
MARYLAND CORPORATION; TOM
CAFFREY; RUBY CAFFREY; DOE
CORPORATIONS 1-20; DOE
CORPORATIONS 1-20; DOE

) CV NO. 03-00130 MLR-BMK
)
) DEFENDANTS SMF SYSTEMS
) CORPORATION, TOM CAFFREY,
) AND RUBY CAFFREY'S
) SUPPLEMENT TO MOTION FOR
) ATTORNEYS' FEES AND COSTS
) FILED DECEMBER 16, 2005;
) AFFIDAVIT OF LYNNE T. T.
) TOYOFUKU; AFFIDAVIT OF H.
) CLYDE LONG; EXHIBIT "A";

ENTITIES 1-20; JOHN DOES 1-20;) CERTIFICATE OF SERVICE
 JANE DOES 1-20; GOVERNMENTAL)
 AGENCIES 1-20,)
) (Non-hearing Motion)
 Defendants.)
 _____) TRIAL: September 19, 2005

SUPPLEMENT TO MOTION FOR ATTORNEYS' FEES AND COSTS

Defendants SMF SYSTEMS CORPORATION, TOM CAFFREY
 AND RUBY CAFFREY ("Defendants") bring this Supplement to Defendants'
 Motion for Attorneys' Fees and Costs filed December 16, 2005.

The total amount of attorneys' fees, including tax, is \$334,785.35.

See Toyofuku Aff. ¶ 2. The following is a chart that amends the total time and
 dollar amount of attorneys' fees listed in Defendants' Motion for Attorneys' Fees
 and Costs:

Timekeeper	Hours Worked	Rate	Total
PRE-TAX TOTAL listed in Defendants' Motion for Attorneys' Fees and Costs, filed December 16, 2005			\$313,836.00
H. Clyde Long, Esq.	37.8	\$200.00	\$7,560.00
Pre-tax Total			\$321,396.00
Excise Tax at 4.166%			\$13,389.35
TOTAL (including taxes)			\$334,785.35

Exhibit A to the Affidavit of H. Clyde Long presents time entries that describe the
 work performed. *See* Long Aff ¶ 2, Ex. A.

Because the attorneys' fees and costs incurred by Defendants in this case were reasonable and necessary to the defense of this case, Defendants respectfully requests that they be awarded their full attorneys' fees and costs pursuant to Fed. R. Civ. P. Rule 54(d).

DATED: Honolulu, Hawaii, January 4, 2006.

/s/ Lynne T. T. Toyofuku
LYNNE T. T. TOYOFUKU
NICHOLE K. SHIMAMOTO

Attorneys for Defendants
SMF SYSTEMS CORPORATION,
TOM CAFFREY AND RUBY
CAFFREY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

JOHN A. MOFFETT,)	CV NO. 03-00130 MLR-BMK
)	
Plaintiff,)	CERTIFICATE OF SERVICE
)	
vs.)	
)	
SMF SYSTEMS CORPORATION, A)	
MARYLAND CORPORATION; TOM)	
CAFFREY; RUBY CAFFREY; DOE)	
CORPORATIONS 1-20; DOE)	
PARTNERSHIPS 1-20; DOE ENTITIES)	
1-20; JOHN DOES 1-20; JANE DOES 1-)	
20; GOVERNMENTAL AGENCIES 1-20,)	
)	
Defendants.)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known addresses:

Served Electronically through CM/ECF:

BARBARA A. PETRUS, ESQ.	bpetrus@goodsill.com	January 4, 2006
ANNE T. HORIUCHI BELL, ESQ.	abell@goodsill.com	January 4, 2006
GOODSILL ANDERSON QUINN & STIFEL		

DATED: Honolulu, Hawaii, January 4, 2006.

/s/ Lynne T. T. Toyofuku
LYNNE T. T. TOYOFUKU
NICHOLE K. SHIMAMOTO
Attorneys for Defendants
SMF SYSTEMS CORPORATION,
TOM CAFFREY AND RUBY
CAFFREY